

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 2

Declaration of D. Armstrong

DECLARATION OF DARIUS ANTOINE ARMSTRONG

1. My name is DARIUS ANTOINE ARMSTRONG
2. My date of birth is 8/1/1984
3. My TDCJ number is 1675648
4. ~~I have been an inmate in the Texas Department of Criminal Justice (TDCJ)'s Wallace Pack Unit in Grimes County, Texas since~~ _____.
5. I am assigned to the Stiles Unit at 12-D-C-33-1
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

DAA° THE AIR CONDITIONING HAS NOT BEEN WORKING
IN MY HOUSING AREA AT THE STILES UNIT SINCE
AT LEAST MAY 2019.

DAA° I SWEAT EVERY DAY IN MY HOUSING AREA, SOMETIMES
EVEN AT 1 OR 2 AM.

DAA° I AM NOT PERMITTED TO TAKE COLD SHOWERS
AT THE STILES UNIT.

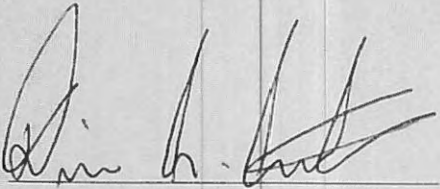
DARIUS ARMSTRONG

DAA ° I AM NOT PERMITTED TO GO TO RESPITE AREAS
AND HAVE BEEN TOLD NO WHEN I ASKED AT STILES.

DAA ° I HAVE HIGH BLOOD PRESSURE AND AM PRESCRIBED
MEDICATION FOR IT.

DAA ° I HAVE TOLD TDCJ STAFF AT STILES THAT
THE AIR CONDITIONING IS NOT WORKING AND
THAT I AM A MEMBER OF THE PACK UNIT CLASS
ACTION LAWSUIT.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature:  Dated: 7-18-19

Printed Name: DARIUS ANTOINE ARMSTRONG